



Food Safety Division

June 30, 2000

Dockets Management Branch
(HFA - 305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville Maryland 20852

Dear Sir or Madam,

Re: Docket No. 00N-1246

IBA Food Safety Division manages several irradiation facilities in the US for the irradiation of food and other new applications. IBA is the leading supplier of irradiation equipment, offering gamma, electron beam accelerators and X-ray technologies to the food, medical and manufacturing industries. IBA owns and operates irradiation facilities in Europe, the United States and Asia.

We agree with FDA's intent to survey consumer attitudes on various food safety issues. Food safety is an important public issue, and we believe more consumers have become concerned and knowledgeable about it.

FDA has noted that the proposed survey will be very similar to the survey of consumers completed in 1998. We understand that having the same questions as asked in the 1998 survey makes statistical analysis easier. Our concern, however, is that we feel consumer attitudes towards irradiated foods have changed. This survey could be improved to develop more information and assess if there has been a change in consumer attitudes towards food irradiation.

We are also concerned that the position of the food irradiation questions, in a section immediately after food safety problems, and in a section of perceived sources of contamination, might lead consumers to think FDA has doubts of the safety of irradiation.

Since the 1998 survey, FDA and USDA have approved the irradiation of meat, and there has been much positive media coverage about the role irradiation could play to improve the safety of meats by killing food borne pathogens. In addition, there are over 300 stores in the US selling irradiated meat products, and many stores selling irradiated Hawaiian produce (depending on the seasonal availability).

We feel these two changes should be sufficient to persuade FDA researchers to position the question on irradiation differently and to consider adding additional questions that probe consumer attitudes towards FDA's approval of irradiation and about the irradiation label.

Would it not be possible to move questions B7 and B8 to another section, perhaps one that includes questions on cooking and other methods that can control food borne pathogens? It would be preferable to preface question B8 by saying, "FDA has approved the irradiation of meat to control bacteria in food." Or, FDA could ask a follow-up question to B8 such as, "Irradiation has been approved as safe by the US Food and Drug Administration. How does this affect your opinion? (Answers = less concerned, same opinion or more concerned or no comment.). This follow up question was used by Schutz, Bruhn and Diaz-Knauf (Food Technology, October, 1989 pp 80 - 86). If FDA included the same question in the survey this year, responses could be compared to that published study. This aspect might interest your statisticians.

00N-1246

6000 Poplar Avenue • Suite 426 • Memphis, TN 38119 • 901-681-9006 • Fax: 901-681-9007

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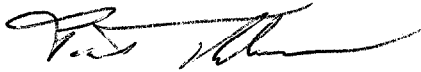
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Since irradiated foods are now being sold to consumers, we would like the survey label section to include questions, or possible answers, about the irradiation label. It might be helpful for FDA and our industry to know if consumers notice the irradiation label and what their perceptions might be. At least, question F2 could include a category for "other – irradiation" in the response list.

IBA is very interested in learning more about consumer attitudes towards food safety. We have appreciated the opportunity to review the proposed survey and we would be interested to have a copy of the survey report when it is available.

Thank you for considering our views.

Yours sincerely,

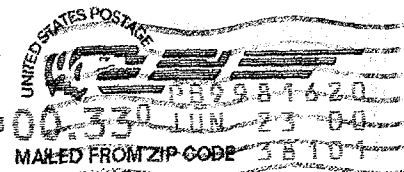
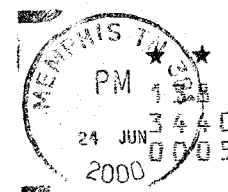
A handwritten signature in black ink, appearing to read "P. Adams", with a long horizontal flourish extending to the right.

Patterson Adams
President
IBA Food Safety Division



SteriGenics

SteriGenics International, Inc.
1661 International Drive, Suite 350
Memphis, TN 38120
www.sterigenics.com



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Rockville Maryland 20852

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